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9 COMMUNICATIONS LLC

10 UNITED STATES DISTRICT COURT

11 CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION

12 ENTROPIC COMMUNICATIONS,
13 LLC,

14 Plaintiff,

15 v.

16 DISH NETWORK CORPORATION,
17 et al.,

18 Defendants.

Case No. 2:23-cv-1043-JWH-KES
(Lead Case)

**COUNTER-DEFENDANTS
MAXLINEAR, INC. AND
MAXLINEAR COMMUNICATIONS
LLC'S APPLICATION FOR LEAVE
TO FILE UNDER SEAL MOTION
TO DISMISS COUNTERCLAIMS
BY DISH NETWORK
CALIFORNIA SERVICE
CORPORATION**

19 **JURY TRIAL DEMANDED**

20 Judge: Hon. John W. Holcomb

21 Action Filed: Feb. 10, 2023

22 Counterclaims Filed: Sept. 21, 2023

23 **Hearing:**

24 Date: Feb. 2, 2024

25 Time: 9:00 a.m.

26 Place: Courtroom 9D, Santa Ana

27 Judge: Hon. John W. Holcomb

20 DISH NETWORK CALIFORNIA
21 SERVICE CORPORATION,

22 Counter-Claimant,

23 v.

24 ENTROPIC COMMUNICATIONS,
25 LLC; MAXLINEAR, INC.; AND
MAXLINEAR COMMUNICATIONS
26 LLC,

27 Counter-Defendants.

Pursuant to Local Rule 79-5.2.2(b) governing documents designated by another as confidential pursuant to a protective order, Counter-Defendants MaxLinear, Inc. and MaxLinear Communications LLC (“MaxLinear”) hereby submit their Application for Leave to File Under Seal Motion to Dismiss Counterclaims by Dish Network California Service Corporation.

MaxLinear seeks leave to file under seal highlighted portions of MaxLinear’s Motion to Dismiss that quote from or reference Exhibit B to the concurrently filed MaxLinear’s Request for Judicial Notice in Support of Notice of Motion and Motion to Dismiss Counterclaims by Dish Network California Service Corporation, as identified below:

Document to be sealed	Portions to be sealed (page:line(s))
Portions of MaxLinear’s Motion to Dismiss that quote from or reference Exhibit B to the concurrently filed MaxLinear’s Request for Judicial Notice in Support of Notice of Motion and Motion to Dismiss Counterclaims by Dish Network California Service Corporation	9:4-5; 17:10; 17:18; 18:1-11; 18:23-24; 21:15-16.

Counter-Claimant Dish Network California Service Corporation (“Dish”) designated the document in Exhibit B as “Highly Confidential – Attorneys’ Eye Only” under the operative protective order (ECF No. 156). (Declaration of Rose S. Lee in Support of MaxLinear’s Application for Leave to File under Seal, ¶ 2.) Dish confirmed the document should be filed under seal. (*Id.* ¶ 3.)

Pursuant to L.R. 79-5.2.2(b)(i), within four days, Dish must file a declaration demonstrating why the material it designated as confidential is sealable. MaxLinear has no position on whether the material should be maintained under seal.

1 This Application is accompanied by a Declaration of Rose S. Lee and a
2 Proposed Order.

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4 Dated: December 22, 2023

MORRISON & FOERSTER LLP

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6 By: /s/ Rose S. Lee
Rose S. Lee

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